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Attorney for Claimant
Karyn Charmbury

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re
PG&E CORPORATION, a California corporation,
and
PACIFIC GAS AND ELECTRIC COMPANY,
INC., a California corporation
Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**OPPOSITION BY CLAIMANT
KARYN CHARMBURY'S COUNSEL
TO REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS MADE BY
REORGANIZED DEBTORS' ONE
HUNDRED EIGHTEENTH
OMNIBUS OBJECTION TO CLAIMS
(CHARMBURY CLAIMS); with
certificate of service attached**

Date: November 30, 2022
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
(by tele/videoconference only)

Counsel for claimant Karyn Charmbury, Donald W. Ullrich, Jr., herewith submits this
opposition to request for order by default as to unopposed objections made by reorganized
debtors' one hundred eighteenth omnibus objection to claims (Charmbury Claims).

Opposition and response to reorganized debtors' one hundred eighteenth omnibus objection to
claims (Charmbury Claims) was electronically served at the following email addresses on

1 November 18, 2022, at 2:33 p.m.:

2 PGElaims@kbkllp.com

3 jkim@kbkllp.com

4 dtaylor@kbkllp.com

5 dsilveira@kbkllp.com

6 The documents served were:

7 (1) NOTICE OF CHANGE OF ADDRESS, TELEPHONE NUMBER, AND FACSIMILE
8 NUMBER OF CLAIMANT KARYN CHARMBURY'S COUNEL; with certificate of service
9 attached
10

11 (2) MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CLAIMANT
12 KARYN CHARMBURY'S OPPOSITION AND RESPONSE TO REORGANIZED DEBTORS'
13 ONE HUNDRED EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS (CHARMBURY
14 CLAIMS); with certificate of service attached
15

16 (3) DECLARATION OF CLAIMANT KARYN CHARMBURY'S COUNSEL IN SUPPORT
17 OF OPPOSITION AND RESPONSE TO REORGANIZED DEBTORS' ONE HUNDRED
18 EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS (CHARMBURY CLAIMS); with
19 certificate of service attached

20 (4) EXHIBITS A THROUGH AA TO SAID DECLARATION

21 From 1:40 p.m. to 2:20 p.m. on November 18, 2022, counsel attempted to electronically file
22 into the above-entitled case via CM/ECF said opposition and response documents identified
23 hereinabove but was denied permission to do so. Counsel contacted DeWanna (counsel is unsure
24 as to the correct spelling of her first name) Chambers at 1.888.821.7606 at approximately 2:57
25 p.m. after further attempts to electronically file, who instructed counsel to send an email to
26 ecf_training@canb.uscourts.gov requesting he be allowed to electronically file into this court's
27 CM/ECF. Counsel understood that he was denied the ability to do so because of long inactivity.
28

1 Counsel sent such an email at 3:13 p.m. Counsel is awaiting action on his request.

2 I certify under the laws of the United States the foregoing is true and correct.

3
4 Dated: November 18, 2022

5 Donald W. Ullrich, Jr.
6 DONALD W. ULLRICH, JR.
7 Attorney for Claimant
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CERTIFICATE OF SERVICE

My name is Donald W. Ullrich, Jr. My business address is 3100 Zinfandel Drive, Suite 265, City of Rancho Cordova, Sacramento County, California 95670-6391. I am over the age of 18 years and not a party to the within action.

On November 18, 2022, I served a true and correct copy of the attached document via electronic email upon the following named individuals, their respective email addresses stated.

After sending said emails, thereafter I received no electronic notification of a failed or undeliverable electronic transmission:

PGElaims@kbkllp.com

Jane Kim jkim@kbkllp.com

David A. Taylor dtaylor@kbkllp.com

Dara L. Silveira dsilveira@kbkllp.com

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: November 18, 2022

Donald W. Ullrich, Jr.
Donald W. Ullrich, Jr.